## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

United States of America,

Case: 2:23-cr-20588

Assigned To: Grey, Jonathan J.C. Referral Judge: Patti, Anthony P.

Assign. Date: 10/17/2023

Description: INDI US V. SEALED MATTER (MC)

Plaintiff,

v.

Violation:

18 U.S.C. § 922(G)(1)

Deandre Martez Graham.

Defendant.

INDICTMENT

OCT 1 7 2023
CLERK'S OFFICE

U.S. DISTRICT COURT

EASTERN MICHIGAN

THE GRAND JURY CHARGES:

## **COUNT ONE**

18 U.S.C. § 922(g)(1)

Felon in Possession of Ammunition

On or about May 25, 2023, in the Eastern District of Michigan, Southern Division, the defendant, Deandre Graham, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, ammunition, specifically, two rounds of 9mm Blazer ammunition, and one round of 9mm PMC ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

## FORFEITURE ALLEGATION

18 U.S.C. § 924(d) and 28 U.S.C. § 2461 Criminal Forfeiture

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code Section 924(d) together with Title 28, United States Code, Section 2461.

Upon conviction of the offense charged in Count One of this Indictment, Defendant Deandre Graham shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461, any firearm or ammunition involved in or used in defendant's knowing violation of said offense, including but not limited to the following:

• 3 rounds of assorted 9mm ammunition.

If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or

e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON United States Attorney

s/Craig F. Wininger

Craig F. Wininger Chief, Violent & Organized Crime Unit

s/Jeremiah G. Smith

Jeremiah G. Smith Assistant United States Attorney

Dated: October 17, 2023

## Case 2:23-cr-20588-JJCG-APP ECF No. 1, Pagel D 4 2:51ed; 12/17/23 Page 4 of 4

United States District Court Eastern District of Michigan	Criminal Case Co	Assign. Date: 10/17/2023	
NOTE: It is the responsibility of the Assistant U.S. A	ttorney signing this form to complete it ac	Description: INDI US V. SEALED MATTER (MC)	
Companion Case Information		Companion Case Number:	
This may be a companion case based	on LCrR 57.10(b)(4) <sup>1</sup> :		
□Yes ☑No		AUSA's Initials: J.S.	
Case Title: USA v. DeAnd	e Graham		
County where offense occ	urred: <u>Wayne</u>		
Offense Type: Felony			
Indictment – no prior compla	int.		
Superseding Case Informat	ion		
Superseding to Case No: Judge:		Judge:	
Reason:			
<u>Defendant Name</u>	<u>Charges</u>	Prior Complaint (if applicable)	
Please take notice that the belo the above captioned case	שי listed Assistant Unite	d States Attorney is the attorney of record for	
and above duptioned dage		$O$ $\Theta$ $O$ $O$	
October 17, 2023	ler	Gramis D. Smith	
Date	/Ass 211	emiah Smith istant United States Attorney W. Fort Street, Suite 2001 roit, MI 48226	

(313) 226-0242 Bar #: P80301

<sup>&</sup>lt;sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.